

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Conn.	<p>No. There is no state plan in place yet.</p> <p>SBC/SNET is subject to the SBC/AIT FCC merger measures and penalties.</p> <p>Also, WCOM has negotiated /arbitrated a performance assurance plan with SNET.</p>	<p>State proceeding is Docket No. 99-07-27 provides for an industry working group to negotiate and recommend to the DPUC specific performance standard measures and submeasures, penalties, business rules and terms and conditions of implementing performance measures for the wholesale provision of telecom services by the incumbent.</p>	<p>Metrics will be proposed by an industry-working group and ultimately approved by the DPUC.</p>	<p>The merger measures SNET is required to report results against use the Texas business rules, standards, etc.</p>	TBD	TBD	TBD	<p>There are no state specific metrics, standards or remedies. Remedies under the SBC/AIT merger conditions are not paid to affected CLECs.</p>

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Illinois	Yes. PMs in place per state condition for approval of SBC-AIT merger. Recently passed state law requires wholesale metrics, establishes benchmarks for various wholesale products: loops, UNE-P, etc. State proceeding resulting from law is in progress.	Merger condition # 30 of SBC/AIT Merger Order: Docket No. 01-0120 State-law derived proceeding: Docket No. 01-0539	Proceedings resulted from merger conditions and state legislation.	About 100 regional collaborative-developed PMs, with less than 15 state specific PMs. Most regional PMs have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2. State specific plan derived from state law pending.	Six-month reviews of regional PMs held with AIT, CLECs and state staffs. Little work has been done so far on remedies in reviews. Meetings move from state-to-state, with disputed issues and consensus agreements brought back to each state for decision and approval.	No. Although Texas plan is available for contract inclusion on interim basis until state finishes final remedy plan litigation.	Yes. Currently problems with metric replication are delaying the 3 rd party test.	Metrics and standards limited to those included in SBC/AIT merger conditions. Remedy plan is weak. Problems with metric replication identified.
Indiana	Yes, reports on the Texas metrics. A state specific proceeding has begun, but talks ended prior to completion of work. Next steps remain pending.	Cause No. 41657	Generic proceeding pending.	About 100 regional collaborative-developed PMs, of which less than 15 are state specific. Regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standard. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	No. Some remedies paid only under individual ATI-CLEC Interconnection Agreements.	TBD	State specific metrics and standards have not been ordered, instead relying on Texas metrics.

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Kansas	Yes.	Docket No. 97- SWBT-411-GIT	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review and KS is free to participate.	Yes. Based on TX remedy plan. While % of net revenue is the same as TX, dollar amounts are specific to KS.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.
Michigan	Yes. PMs have been ordered. They were largely agreed to by the parties.	Docket No. Case No. U-11830.	Generic proceeding. AIT region-wide collaborative	About 100 PMs, less than 15 are state specific. The regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2. With some state specific variations, in some cases resolved via state dispute resolution process.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	Yes.	Yes. The metrics are being used as part of a 3 rd party OSS Test.	Some improvement required, although Michigan metrics, standards and remedy plan are superior to those in other AIT states.
Missouri	Yes.	Case No. TO-99-227	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review, and MO is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, amounts are specific to MO.	Yes. PSC audited the measurement reporting system and results.	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.

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Nevada	Yes. Nevada Bell has had measures and standards since June 1999. The measures and standards were revised effective May 2001 to incorporate parties' negotiated changes to the measures.	Docket No. 97-9022	The measures and standards were agreed to after several months of collaborative workshops. They were "stipulated" to by Nevada Bell, Verizon, Sprint and the participating CLECs, and ordered by the Commission.	The measurements were developed specifically for California and Nevada.	Periodic reviews were agreed to by the parties. It is prescribed by a Commission rulemaking that they occur annually.	Yes, effective as of August 2001, per a PUC decision in Docket No. 01-1048.	Yes, the measures were audited by PWC. Nevada Bell did not have its own 3 rd party OSS Test. It has requested that the PUC rely on the test that was conducted for Pacific Bell.	Ok, although the real test of the measures and standards will occur once commercial volumes exist. No Tier II incentive provision. It is possible that the parties have overlooked a process that turns out to be critical to the OSS process, or that the ILEC's interpretation of the business rules allows it to under-report performance failure.

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Ohio	Yes. TX metrics were ordered as a condition of the SBC-AIT merger. Metrics have been modified in the regional 6-month collaboratives	Case no. 98-1082-tp-amt. In 2000, Ameritech filed a motion to establish a procedural schedule for its anticipated 271 filing. In June 2000, the PUC established Case No. 00-942-tp-coi to address OSS and PM issues, 3 rd party testing and its 271 application.	Initially addressed by stipulation in SBC/AIT merger docket. The stipulation established industry collaboratives to evaluate the feasibility and applicability of implementing the Texas measures. Collaborative participants were given opportunity to propose changes to the metrics and to bring disputed issues to the commission for resolution. Some measures were added and modifications were made to the existing TX measures via a series of joint pleadings filed in October 2000. The OSS collaborative proceeded on the same track. In December 2000, the PUC acknowledged the filing of the agreed-to measures and OSS issues, approved the master test plan for the OSS test conducted by KPMG. Briefs filed in February 2001 regarding disputed measurement and OSS issues.	The measures are basically regional, although there may be state-specific differences because of the collaboratives established in each Ameritech state. The measures are based on the Texas plan and include 105 of the TX PMs.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval. Amended measures were filed in June 2001 and October 2001.	No. It is a disputed issue that has been deferred for later consideration. Penalties will be tied to the measures based on the Texas remedies plan. These are pending commission resolution.	The 3 rd party test is underway and the measures will be tested. The stipulation established a collaborative to address OSS issues, and as part of the order approving the stipulation, the commission ordered a 3 rd party OSS test.	No remedies yet. Texas remedy plan is not sufficient and the Commission has indefinitely deferred the development of an appropriate remedy plan.

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Oklahoma	Yes.	Cause No. PUD 97-0000560	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review, and OK is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, dollar amounts are specific to OK.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.
Texas	Yes	16251, Order No. 55	271 proceeding	Anchor state, other SWBT states, as well as Ameritech states mirror the Texas plan measures.	Periodic reviews are held every 6 months.	Yes.	A review of the measures was performed by Cap Gemini as part of the 3 rd party OSS test. The measures were also used to evaluate the test output.	Remedy plan is weak because plan includes "K table" mitigation
Wisconsin	Yes. State proceeding on metrics concluded in 2000.	Docket No. 6720-TI-160 (the OSS docket)	State proceeding	There are about 100 PMs, less than 15 of which are state specific. The regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	PSC issued a Remedy Plan Order Sept. 25, 2001. AIT filed motion for and obtained Stay of portions of the Order requiring AIT to make payments under remedy plan. Court schedule pending for briefing and ruling. Decision not expected before May 2002.	TBD	AIT is still not required to pay remedies yet.

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Verizon: Of the 14 states described below, only 9 states have metrics and standards in place and of those only 6 states have remedy plans in effect as of comment date of 1/22/02.

California	Yes. VZ has had measures and standards since August 1999. Measures were revised effective May 2001 to incorporate parties' negotiated changes to the metrics	Proceeding number: R.97-10-016/1.97-10-017, decision D.99-08-020, and D.01-05-087.	The measurements resulted from collaborative negotiations between Pacific, Verizon and the CLECs as part of the PUC's investigation into the OSS performance of Pacific and Verizon. The Commission has adopted a Change Mgmt Process (completed in Feb. 1999), and performance measures. The implementation of a performance incentive plan is pending.	The metrics were developed specifically for California and Nevada	The CPUC provides for periodic reviews of the measures. Review is initiated by the CPUC via a pre-hearing conference. Parties propose changes, negotiate and agree to settle, whenever possible. Parties submit their agreements and open issues to the CPUC for it to approve and where there are issues, to decide.	Almost. Final decision adopting payment amounts for a performance incentive plan will be adopted in February 2002. This, plus the decision adopting the incentives model (D. 01-01-037) in January 2001 will comprise California's incentive plan.	Yes, the measures were audited by Deloitte & Touche.	Generally ok although real test of the measures and standards will occur once commercial volumes exist. No incentive payments have been made yet. It is possible that the parties have overlooked a process that turns out to be critical to the OSS process, or that the ILEC's interpretation of business rules allows it to under-report performance failure
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Conn.	Verizon currently required to comply with performance metrics embodied in the PAP, which largely mirrors the New York performance assurance plan.	State proceeding is Docket No. 99-07-27 (DPUC Promulgation of Performance-based Reporting Requirements Regulations for Connecticut Telephone Companies (ILEC)) provides for an industry working group to negotiate and recommend to the DPUC specific performance standard measures and submeasures, penalties, business rules and terms and conditions relating to the implementation of performance standard measures for the wholesale provision of telecom services by the incumbent.	Metrics will be proposed by an industry-working group and ultimately approved by the DPUC. The regulations and reporting requirements from DPUC Docket No. 99-07-27 are not yet final or effective.	Largely regional.	Verizon files changes to its PAP with DPUC.	The regulations, and ultimately metrics, anticipated from the DPUC Docket No. 99-07-27 are separate and distinct from the PAP adopted as a result of the state 271 proceeding.	No.	Has room for improvement. The regulations and reporting requirements from DPUC Docket No. 99-07-27 are not yet final or effective.
Delaware	No	N/A	N/A	N/A	N/A	No.	N/A	N/A

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Maine	No. PAP and C2C are currently being considered in the state 271 proceeding.	Docket No. 2000-849.	The PAP and C2C metrics are both based on NY. The PUC has stated an intent to add ME specific metrics.	Likely to be both, but largely regional, based on NY.	TBD	TBD.	No.	TBD
Maryland	No. The Commission is now considering metrics and standards in the on-going "Collaborative" process. A decision could come at any time.	No official docket number.	The metrics and standards are modeled after NY, although there are some state specific metrics. Differences are usually related to timing (one state implementing new/changed metrics before another state). Verizon has generally agreed with CLECs and the state commission about the need for metrics and standards. Thus, consensus has generally been achieved.	Regional, based on NY.	Plan is not in place yet so it is not known how periodic reviews will be handled.	There is no process yet for implementation of remedies.	No. There has been no 3 rd party test or audit of the metrics.	TBD

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Mass.	Yes, metrics are in place. On January 14, 2000, the DTE adopted the New York Carrier-to-Carrier Performance Guidelines (as amended on a going-forward basis) as the "set of metrics used by the DTE for purposes of the Master Test Plan and for evaluating Verizon's compliance with the requirements contained in Section 271."	D.T.E. 99-271, January 14, 2000 DTE Letter Order on Final OSS Master Test Plan, Attach. A (http://www.state.ma.us/dpu/telecom/99-271/OSS/LtrOrder_Jan14.pdf).	Metrics based on NY C2C (as amended), per DTE order.	Regional, based on NY metrics.	Per the DTE's January 14, 2000 Letter Order, the Guidelines adopted "will continue to be modified by all future additions, deletions or modifications made to the C3C Guidelines hereafter by the NYPSC."	Penalties are based on the same standards as the MA PAP, and the NY plan. They are also subject to NY revisions.	Yes. The DTE "direct[ed] KPMG to examine and evaluate Bell Atlantic's performance based on the metrics contained in the C2C Guidelines that are in effect when the preorder, order and provisioning transaction testing begins."	Some of the metrics need improvement.
New Hampshire	No. On June 7, 2001, Verizon petitioned the PUC to approve the NY C2C metrics for NH. The PUC is reviewing and has not made a decision on whether it will accept the NY measures or modify them.	Docket No. 01-006	Will be primarily based on the NY metrics, though they may be tailored to address the specific concerns of competitors in NH.	Regional, based on NY.	If the VZ proposed metrics are adopted in NH, any revisions to the NY metrics will be filed in NH within 20 days.	No. Options are still being reviewed and a PAP has not yet been finalized.	Yes. As part of its OSS review for sameness, PWC did a review of the NH metric reporting for sameness with the New England region.	Some of the metrics need improvement.

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New Jersey	Yes. The Board has ordered metrics.	Docket No. TX98010010	The metrics and standards are modeled after NY, although there are some state specific metrics. Differences are usually related to timing (one state implementing new or changed metrics before another state). Verizon has generally agreed with the CLECs and the state commission about the need for metrics and standards. Thus, with minor exceptions consensus has generally been achieved.	Regional, based on NY.	Plan has not been in place long enough to know how periodic reviews will be handled.	Yes. The Board ordered remedies in October 2001 in the same docket as the metrics docket. The remedies, which are tied to the metrics, are based on the staff plan, which is not based on NY. plan. It is a per occurrence/ per measure plan.	Yes. The metrics were included in the 3 rd party test.	Some of the metrics need improvement. The penalty amounts are very low.
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New York	Yes. Metrics have been in place since February 16, 1999.	Adopted in Case 97-C-0139, <i>Proceeding on Motion of the Commission to Review Service Quality Standards of Telephone Companies. Order Adopting Inter-Carrier Service Quality Guidelines</i> (issued and effective February 16, 1999).	At the time it instituted Case 97-C-0139 in Feb. 1997, the PSC recognized that no formal service quality standards for carrier-to-carrier services existed, although the issue had been raised by parties in several other PSC proceedings, and directed Staff to work with parties to address the issues concerning C2C standards. Interim Guidelines for C2C Standards and Reports were developed through a collaborative process involving industry reps, Staff and the ALJ overseeing the proceeding. The Commission approved the Interim Guidelines on 3/16/98, for a trial period extending through 12/31/98. Then, on 2/16/99, the Commission issued an order adopting the C2C Guidelines, a revision of the Interim Guidelines document.	Regional in that other states have based their metrics on NY.	The C2C Guidelines are subject to change, as Case 97-C-0139 remains an ongoing proceeding with CWG meeting regularly throughout the year to discuss modifications that should be made to the Guidelines as parties gain experience in the market. Consensus and non-consensus modification proposals are acted on by the Commission on Generally a bi-annual basis.	Yes. Penalties are tied to VZ's PAP, not to the C2C Guidelines.	Yes. KPMG tested the metrics as part of the OSS review for Verizon's 271 application. More specifically, KPMG tested the accuracy of VZ's reporting, not the adequacy of the metrics. Since KPMG's test, there have been many modifications to the C2C Guidelines. Staff has been replicating the metrics.	Some of the metrics need improvement. For example, the trunking measures are inadequate. The measures, including the trunk blocking metric, are currently the subject of review and negotiations within the CWG.

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Penn.	Yes. First order was December 1999. The PUC is now considering a recommended decision of an ALJ in its review of the PAP. A decision could come at any time.	Docket No. P-00991643, and Docket No. M-00011468.	<p>The metrics and standards are modeled after NY, although there are some state specific metrics. Differences are usually related to timing (one state implementing new or changed metrics before another state).</p> <p>Verizon has generally agreed with the CLECs and the state commission about the need for metrics and standards. Thus, with some minor exceptions consensus has generally been achieved.</p>	Regional, based on NY.	There is a presumption that changes in NY are appropriate for PA, but that presumption is rebuttable.	The commission initially ordered a plan, but it was shown to be weak during the 271 case. As a result, the PUC instituted the latest proceeding. The ALJ has recommended that the PUC adopt essentially the NY plan. The remedies are tied to the metrics.	Yes. The metrics were included in the 3 rd party test.	Poor.
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Rhode Island	Yes. Per recent Order, C2C metrics have been adopted.	Docket Nos. 3195 & 3256, Report and Order (Dec. 3, 2001. In re: VZ-Rhode Island's Proposed Carrier-to- Carrier Performance Standards and Reports and Performance Assurance Plan for Rhode Island. (http://www.ripuc.org/order/pdfs/VRI_CTC_PAP_Ord16809.pdf)	Based on NY & MA, per PUC order.	Regional in that they are based on NY & MA. PUC also incorporated two PA billing metrics into C2C and PAP, made several changes to how PAP penalties would be calculated, and ordered potential future revisions to C2C to be based on changes in all VZ states, not just NY and MA.	From Dec. 3, 2001 Report & Order: "the Commission requires Verizon to file for Commission consideration of any new metrics adopted in Verizon's service territory, as well as in the former Bell Atlantic territory before its merger with GTE, within thirty (30) days of the compliance filing with that state Commission. In addition, to assist the Commission in determining whether Verizon is meeting the PAP metrics, the Commission will require Verizon to file with its monthly C2C performance reports a chart, similar to one submitted in Docket No. 3363, indicating whether it has met or failed to meet each PAP metric included in C2C."	Penalties are tied to metrics comprising the PAP; also subject to NY & MA revisions, i.e., "Any modifications ordered to the PAPs in NY or MA will be filed for this Commission's review within 10 days of the compliance filing in NY or MA").	Yes. Per May 17, 2001 Order, the PUC "direct[ed] KPMG to submit an amended final Master Test Plan for the Verizon- Rhode Island OSS Test that excludes metrics report validation and data integrity validation." KPMG generally conducted "sameness" testing "to determine whether the processes and procedures" were the same for VZ- RI and VZ-MA.	Some of the metrics need improvement. Also, the PUC's demand to be informed of metrics changes throughout VZ's territory suggests that RI metrics may evolve.
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Virginia	Yes. The SCC issued an order on 1/4/02 requiring VZ to implement the agreed to and ordered metrics and standards by 1/18/02. First results to be reported in March based on February 2002 data Remedies are the subject of a second docket. Comments in the remedies docket were filed in November, 2001. Date for a decision in the remedies docket is unknown.	Docket No. PUC -010206 and Docket No. 010226.	The metrics and standards are modeled after NY, although there are some state specific metrics. Differences are usually related to timing (one state implementing new or changed metrics before another state). Verizon has generally agreed with the CLECs and the state commission about the need for metrics and standards. Thus, with some minor exceptions consensus has generally been achieved.	Regional, based on NY.	Verizon is required to file with the Commission the NY consensus and/or non-consensus metric change(s) and proposed implementation schedule, including an explanation of time required to implement, and description of the changes made to adapt to Virginia systems. Filings must be made within 30 calendar days of submission date of the compliance filing in NY.	Not yet. The SCC is considering remedies in Docket 010226.	Yes. The metrics were included in the 3 rd party test.	TBD. Order was just released.
Vermont	Yes. Per Stipulation setting NY C2C measurements as the measurements for VT (October 2001).	Docket No. 6255	Metrics are based on the NY metrics, though they may be tailored to address the specific concerns of competitors in VT.	Regional, based on NY.	If a change is made to NY it must be filed in VT within 30 days.	Not yet. Penalties are still being discussed in VT Docket No. 6255. No final PAP has been issued.	Yes. As part of its OSS review for sameness, PWC did a review of the VT metric reporting for sameness with the New England region.	Some room for improvement.
Wash. DC	No	N/A	N/A	N/A	N/A	No	N/A	N/A
West Virginia	No	N/A	N/A	N/A	N/A	No	N/A	N/A

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Bell South: Six states have approved metrics and standards and a remedy plan in effect as of comment date of 1/22/02.								
Alabama	Not yet. BST has been reporting results based on the GA Metrics.	Docket No. 25835	Metrics were considered during the 271 hearings.	Based on BST's regional set of metrics, adjusted as required.	TBD, but BST generally amenable to six-month review.	Not yet, but BST and CLECs have both proposed remedy plans.	No test planned.	TBD
Florida	Yes. An order has been issued, and BST has filed a proposed compliance plan. The CLECs have filed comments. A vote is expected on the compliance plan soon.	Docket No. 000121-TP, Order No. PSC-01-1819-FOF-TP, issued 9/10/01	Permanent Docket	GA based metrics plus some additional metrics (e.g., Billing Errors Correcting in X Days) from other states, e.g., Texas. Commission also used experience from the 3 rd party test to modify some of the business rules, exclusions and benchmarks.	Yes.	Yes. Plan is per measure and includes more submeasures than any other BST state. Plan includes one of better statistical test methodologies in region. Severity component is very weak BST given long time to implement plan and it is not contingent on 271 approval.	KPMG is using a set of interim Metrics to evaluate results of 3 rd party OSS Test. KPMG has not provided final recommendations yet. Test may not conclude until end of January 2002 however, KPMG has indicated there will be a delay re: findings w/r/t sufficiency of interim Metrics. PUC order includes annual audits paid for by BST over next 5 years.	Metrics and benchmarks are one of best in region, but severity component of remedy plan is very weak and BST is given a long period of time to implement.
Georgia	Yes. Order issued on 1/16/01.	Docket No. 7892-U.	Generic proceeding.	GA metrics are basis for metrics in most BST states.	Yes.	Yes. Remedy plan has parameter delta—Tier I 0.5 and Tier II 0.35 for judging parity, but it is not strong enough.	KPMG is still testing them.	Metrics need improvement. Remedy plan is not strong enough.

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ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Kentucky	Yes. Order issued on 10/19/01.	Case No. 2001-105	KY adopted metrics and standards similar to GA.	Though PUC had a full hearing, the decision mirrors the GA plan, except for 2 metrics that are held in abeyance.	Yes.	Yes, it took effect 10/2001. Plan mirrors the GA plan.	No.	KY is better than what BST was advocating but metrics need improvement. Remedy plan is not strong enough.
Louisiana	Yes. First order issued on 5/14/01. A second order was issued on 7/31/01.	Docket No. U-22252, Subdocket C.	Collaborative workshops. Also state 271 decision added a new metric (for UNE-P loss of dial tone) and associated remedies.	One of first states in region to develop metrics, so not as similar to GA.	Yes. (Currently underway).	Yes, took effect 7/01, which was prior to 271 approval. Plan is not very effective, as payments are very low. Plan includes the 1 critical delta as proposed by BST without much change.	No, though KPMG audit is to be part of current review.	Weak on benchmarks and remedies compared to other BST states.
Mississippi	Yes. Order issued on 10/4/01. Metrics are based on BST's proposed SQM and SEEM plans, which are similar to GA's.	Final Order, Docket No. 97-AD-321.	No Collaboratives. Adopted as part of state 271 approval issued on 10/4/2001.	Similar to GA's metrics.	Per PSC Order, Metrics can be revisited upon BST's request or PSC's Motion. Also, while Order requires BST to use GA metrics, it's unclear whether updates will be made when GA metrics change as a result of its six-month reviews.	Yes, but uses 1 delta proposed by BST and remedies will not be paid until after BST "exercises an FCC grant of interLATA authority in Mississippi." Also, MSPSC removed one metric that was causing BST to pay remedies in GA.	No, BST has relied on GA 3 rd Party Test in its 271 advocacy.	WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger remedies.

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North Carolina	No. BST advocates for its SQMs and its SEEM remedy plan which was approved by the GA PSC. However, BST did not propose the metrics in GA PSC's order verbatim.	P-100, Sub 133k (Generic docket) (briefing complete; awaiting order) and P-55, Sub 1022 (271 app) (briefs due 12/7).	Currently, a generic PM docket is open and BST's 271 docket is open. An industry task force reported to PUC, but only real changes BST made to its plans were based on changes GA PSC ordered.	If BST's metrics are approved, plan will be very similar to GA's.	TBD	Not yet. In addition, BST advocates that its remedy plan only be effective upon FCC 271 grant.	No, BST has relied on GA 3 rd Party Test in its 271 advocacy.	Pending final ruling. BST proposal is lacking as WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger penalties.

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South Carolina	Yes, as of 11/6/01, however, no written order yet. The PSC intends to require BST to report against its SQMs on a regular basis to prevent backsliding	Docket 200- 209-C.	No Collaboratives. Approved by PSC as part of BST's SGAT- 271 application on 11/6/2001.	PSC ordered BST's SQMs and SEEM/ Incentive Payment Plan that are similar those approved by GA PSC.	For metrics, it is unclear. Initial review of incentive plan will be held 6 months after BST's 271 application is approved by the FCC. Will be reviewed every 6 months thereafter.	Yes. But only becomes effective when 271 granted by FCC. Plan ppears to be same as proposed by BST. May be only BST state to require inclusion into ICA before plan takes effect. Commissioners stated PUC would fine BST in addition to the plan if it saw poor performance. CLECs would not be required to request such fines.	No, BST has relied on GA 3 rd Party Test in its 271 advocacy.	Plan is based on GA. WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger remedies.
Tennessee	Not yet. PUC has held a hearing to decide on metrics and remedies. Anticipated BST will be required to report results at state level (which would be a change).	Docket No. 01-00193	Full hearing.	TBD	TBD	TBD. Plan stemmed from ITC^DeltaCom ICA arbitration grant. Plan is more like CLECs' plan than BST's.	TBD	TBD

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Qwest: No state has an approved set of metrics or a remedy plan as of comment date of 1/22/02.								
Arizona	No. The metrics, known as performance indicator definitions ("PIDs") are 90% complete, but have not been formally approved yet. They will be in the Qwest's 271 filings to the FCC, no earlier than February 2002 and are in the ACC 271 record now.	Docket No. T-00000A-00-0238.	AZ OSS TAG Meetings and Workshops.	The metrics and incentive plans are state-specific but very similar to ROC PIDs, with some slight state variation. (The PIDs were developed in AZ and ROC simultaneously.)	Yes. Per PAP updated in a six-month review. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process and have also requested more frequent revision in unresolved PAP review process.	Yes, but a CLEC cannot receive any penalties unless it opts into the Incentives Plan (PAP). A subset of the PIDs are included in the PAP and a subset of these are eligible for incentives.	Yes. CGE&Y audited the metrics.	Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics e.g., Change Management.

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Colorado	<p>No. The metrics, performance indicator definitions ("PIDs") are 90% complete, but have not been formally approved yet. They will be in the Qwest's 271 filings to the FCC, no earlier than February 2002 and are in the CoPUC 271 record now. WCOM is adding standards to "diagnostic" metrics, revisiting standards and metrics, and advocating for new metrics, e.g., Change Mgmt.</p> <p>In addition to metrics and an incentive plan, state also has Wholesale Quality of Service rules (4 CCR 723-43), which were developed in 1997-8, although they are not as extensive.</p>	Docket Nos. 97I-198T & 01I-041T	ROC TAG Meetings and Workshops.	The metrics in the incentive plans are regional and the metrics in the wholesale rules are state specific.	Incentive plan metrics may be updated in a six-month review per the PAP. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process. The Wholesale Quality of Service rules have to be changed through a separate rulemaking proposed by the PUC, there is no routine review.	<p>Yes, but a CLEC cannot receive any payments unless it opts into the Incentives Plan (PAP). Also, no payments are made until Qwest receives 271 authorization</p> <p>The Wholesale Quality of Service rules also include an incentive component, whose payments must be accepted in lieu of another remedy.</p>	<p>Liberty Consulting has audited the PIDs for the ROC.</p> <p>The Wholesale Quality of service rules were not tested.</p>	<p>Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics</p> <p>Colorado Wholesale Quality of Service rules are not good in comparison to ROC PIDs because they are not as complete and comprehensive.</p>

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ROC, except Arizona, Colorado Minnesota and South Dakota	The metrics are 90% complete, but have not been formally approved yet. They will likely be by the individual state PUC's in their 271 findings to the FCC, no earlier than February 2002. WCOM is adding standards to "diagnostic" metrics, revisiting standards and metrics, and advocating for new metrics, e.g., Change Mgmt. In Utah, in addition to metrics and incentive plan, there are specific Wholesale Quality of Service rules (R746-369), although they are not as extensive.	Various state dockets.	ROC OSS TAG Meetings and Workshops, and AZ OSS TAG Meetings and Workshops.	The metrics and incentive Plans are regional. (Metrics were developed in AZ and ROC simultaneously. Metrics are generally the same, with limited exceptions.)	Yes. Updated at six-month review per the proposed PAP. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process. The Utah Wholesale Quality of Service rules have to be changed through a separate rulemaking proposed by the PUC, there is no routine review.	Yes, but a CLEC cannot receive any penalties unless it opts into the Incentives Plan (PAP). A subset of the PIDs are included in the PAP and a subset of these are eligible for incentives.	Yes. Liberty Consulting Group audited the metrics. The Wholesale Quality of service rules were not tested.	Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics. Utah Quality of Service rules are not good by comparison because they are more limited.

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Minnesota	Not yet.	There are two open dockets dealing with metrics and penalties. Docket No. P421/M-00-849 was opened several years ago, and a 271 PAP docket (Docket No. P421/M-01-1376).	Docket was intended to be in place prior to any 271 PAP. However, it does not look like that will occur. This case should be before the PUC for a final decision in January 2002. Order to include metrics and incentives.	Metrics will most likely be based on ROC PIDs. The Wholesale Docket metrics will likely be state specific.	TBD. Likely that both dockets will include a review process.	TBD. Likely that both dockets will include an incentives plan.	TBD	TBD
Nebraska	Not yet.	PUC has opened a wholesale service quality docket. The docket was concluded by stating that Qwest should file a PAP as part of 271 and PUC declines to use its state authority to impose penalties.	N/A	N/A	N/A	N/A	N/A	N/A

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South Dakota	Not yet.	N/A	No proceedings yet.	N/A	N/A	No incentives have been established yet.	N/A	N/A
SBC: 12 states have metrics and standards in place but of those only 7 states have a remedy plan in effect as of comment date of 1/22/02.								
Arkansas	Yes.	Docket No. 00- 211-U	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review and AR is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, dollar amounts are specific to AR.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.
California	Yes. Pacific has had measures and standards since August 1999. Measures were revised effective May 2001 to incorporate parties' negotiated changes to the metrics.	Proceeding No. R.97-10-016/ I.97-10-017, decision D.99- 08-020, and D.01-05-087.	The measurements resulted from collaborative negotiations between Pacific, Verizon and the CLECs as part of the PUC's investigation into the OSS performance of Pacific and Verizon. The Commission has adopted a Change Mgmt Process (completed in Feb. 1999) and performance measures. The implementation of a performance incentive plan is pending.	The metrics were developed specifically for California and Nevada.	The CPUC provides for periodic reviews of the measures. Review is initiated by the CPUC via a pre-hearing conference. Parties propose changes, negotiate and agree to settle whenever possible. Parties submit their agreements and open issues to the CPUC for it to approve and where there are issues, to decide.	Almost. Final decision adopting payment amounts for a performance incentive plan will be adopted in February 2002. This decision plus the decision adopting the incentives model (D. 01- 01-037) in January 2001 will comprise California's incentives plan.	Yes, the measures were audited by PWC and also used as an evaluative tool as part of the 3 rd party OSS Test.	Generally ok although the real test of the measures and standards will occur once commercial volumes exist. No incentive payments have been made yet. It is possible that the parties have overlooked a process that turns out to be critical to the OSS process, or that the ILEC's interpretation of the business rules

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								allows it to under-report performance failure